

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BARBARA F. STRICKLAND,
YOLANDA LEE, on behalf of plaintiffs and the
class described herein,

Plaintiff,

V.

TSYS TOTAL DEBT MANAGEMENT, INC.
d/b/a NATIONAL ATTORNEY NETWORK,

Defendant.

Case No.: 08 CV 34

Judge Lindberg

Magistrate Judge Brown

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO
ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT**

Defendant, TSYS Total Debt Management, Inc. (“TSYS”), by its attorneys, Peter D. Sullivan and Jennifer W. Weller, pursuant to Federal Rule of Civil Procedure 6(b), respectfully requests that this court grant it a 14-day enlargement of time, or up until March 4, 2008, to file a responsive pleading to Plaintiff’s Complaint, and in support thereof, states as follows:

1. On January 2, 2008, plaintiffs filed their complaint against TSYS alleging violations of the Fair Debt Collection Practices Act (“FDCPA”).

2. Defendant moved for an enlargement of time and its responsive pleading is currently due on February 19, 2008.

3. In investigating the claims alleged in preparation for its responsive pleading, defendant discovered that plaintiffs' credit card accounts may be governed by arbitration clauses. Defendant requests an additional 14 days to investigate this issue.

4. Defense counsel has spoken to plaintiff's counsel and he has indicated that he has no objection to this motion.

5. The additional time will not cause any delay or prejudice any party in this case.

WHEREFORE, defendant, TSYS TOTAL DEBT MANAGEMENT, INC. respectfully requests this court grant it an enlargement of time up to and including March 4, 2008, to file a responsive pleading to Plaintiff's Complaint.

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